

THE WOOTEN LEGAL CONSULTING, PC

*Counselors at Law*

*Attorneys at law*

235 ARLINGTON AVENUE

BROOKLYN, NY 11207

TELEPHONE: (917) 722-9384

ALTERNATE TELEPHONE: 917-484-3813

ANTOINETTE M. WOOTEN\*\*

F. RICHARD HURLEY\*

[WWW.THE-WOOTEN-LEGAL-CONSULTING-PC.NET](http://WWW.THE-WOOTEN-LEGAL-CONSULTING-PC.NET)

OTHER OFFICES:

(OF COUNSEL)

WEST ORANGE, NEW JERSEY

Honourable Claire C. Ceechi,  
Judge, US District Court  
District of New Jersey  
Newark, NJ 08608

December 13<sup>th</sup>, 2017

Re: Michael A. D'Antonio v. Borough of Allendale et al, 2:16-cv-00816- (CCC)

Dear Judge Ceechi:

As you are aware, this firm represents the plaintiff in the above-referenced action, and I am the attorney of record for the plaintiff for this matter.

I am writing in response to the defendants, Borough of Allendale's request to file an extensive brief in support of its Motion to Dismiss the plaintiff's Second Amended Complaint on the basis that there are several defendants associated with the Borough of Allendale even though defendants, David Bole and the Passiac River Coalition have already filed their extensive perspective Motions to Dismiss of over forty pages each which mirror the other defendants'

Motions to Dismiss claiming, iter alia, that the plaintiff is barred from filing his claim based on lower courts' decisions which did not address the plaintiff's concerns regarding the Fair Housing Act, which he has standing to claim; the denial of the plaintiff's Due Process, which is not time barred; and the denial of the Equal Protection clause as it relates to the Fair Housing Act, all of which are federal questions and fall under this court's jurisdiction.

It is therefore, plaintiff's request that he be granted permission to file an opposition of at least fifty pages to the defendants pending Motions, ~~except the defendant Mark S. Carter~~. Moreover, it is the plaintiff's position and belief, that the additional twenty-five pages to be submitted by the defendants, Borough of Allendale, will be superfluous and a waste of this Court's and the plaintiff's time causing counsel for the plaintiff to spend numerous hours reading language which has already been used by defendants, Bole, Borough of Allendale, and most others in their current Motions to Dismiss. request to extend its brief.

The plaintiff also requests an additional week to submit his oppositions to the defendants Motions to Dismiss.

Sincerely,

s/s Antoinette M. Wooten, Esq.

PLAINTIFF'S REQUEST TO FILE ONE (1)  
OMNIBUS OPPOSITION OF UP TO FIFTY (50)  
PAGES TO DEFENDANTS' MOTIONS IS  
GRANTED.

PLAINTIFF'S REQUEST FOR A ONE (1)  
WEEK EXTENSION TO FILE THE  
OMNIBUS OPPOSITION IS GRANTED.

SO ORDERED

s/Claire C. Cecchi  
Claire C. Cecchi, U.S.D.J.

Date: DECEMBER 15, 2017